

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FRANCHISE GROUP, INC.,¹

Reorganized Debtor.

Chapter 11

Case No. 24-12480 (LSS)

(Jointly Administered)

RE: D.I. 1862

**NOTICE OF SUBMISSION OF PROOFS OF CLAIM
REGARDING LITIGATION TRUSTEE'S FIRST OMNIBUS
OBJECTION (NON-SUBSTANTIVE) TO CERTAIN
AMENDED, SUPERSEDED OR DUPLICATE CLAIMS**

PLEASE TAKE NOTICE that on September 19, 2025, Lawrence R. Hirsh, as the Litigation Trustee in the above-captioned case (the “**Trustee**”) filed his *First Omnibus Objection (Non-Substantive) to Certain Amended, Superseded or Duplicate Claims* (the “**Objection**”) [D.I. 1862] with the United States Bankruptcy Court for the District of Delaware. A hearing on the Objection is scheduled for November 18, 2025 at 10:00 a.m. (ET).

PLEASE TAKE FURTHER NOTICE that pursuant to Del. Bankr. L.R. 3007-1(d)(vi)(B), copies of the proofs of claim (the “**Proofs of Claim**”) to which the Trustee objected under Del. Bankr. L.R. 3007-1 have been delivered to Chambers together with a copy of the Objection.

PLEASE TAKE FURTHER NOTICE that this notice of submission of proofs of claim has been served upon all parties requesting notice under Fed. R. Bankr. P. 2002. Any parties who

¹ The last four digits of Franchise Group, Inc.’s federal tax identification number are 1876. The mailing address for Franchise Group, Inc. is 2371 Liberty Way, Virginia Beach, Virginia 23456. In addition to the foregoing Reorganized Debtor, the “Reorganized Debtors” include certain affiliated entities, a complete list of which, including the last four digits of their federal tax identification numbers and addresses, may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FRG/>. All motions, contested matters, and adversary proceedings that remained open as of the closing of such cases, or that are opened after the date thereof, are administered in the remaining chapter 11 case of Franchise Group, Inc., Case No. 24-12480 (LSS).

wish to receive copies of the Proofs of Claim may do so by making a request to undersigned counsel.

Dated: October 22, 2025

RAINES FELDMAN LITRELL LLP

/s/ Thomas J. Francella, Jr.

Thomas J. Francella, Jr. (No. 3835)
Mark W. Eckard (No. 4542)
824 North King Street, Suite 805
Wilmington, DE 19801
(302) 772-5803
tfrancella@raineslaw.com
meckard@raineslaw.com

- and -

Hamid R. Rafatjoo (*pro hac vice*)
4675 MacArthur Court, Suite 1550
Newport Beach, CA 92660
Telephone: (310) 440-4100
Email: hrafatjoo@raineslaw.com

- and -

David S. Forsh (*pro hac vice*)
1350 Avenue of the Americas, 22nd Floor
New York, NY 10019
Telephone: (917) 790-7100
Email: dforsh@raineslaw.com

Counsel to the Litigation Trustee